

1 Media Services represents.

2 Q I see. Thank you. Now, during your deposition you
3 gave me an example. I wonder if you would repeat it so that
4 the record's clear, and it was a very good example and you
5 used Dr. Kennedy's program on how Media Services on behalf of
6 -- how it would -- how Media Service would conduct its
7 business on behalf of NMTV, and would you use the Dr. Kennedy
8 again in explaining that?

9 A Yes. Each station within the broad scope of the
10 Trinity Broadcasting Network that Media Services might
11 represent has an individual rate card for which -- and we
12 don't classify it as a, as a sale of our air time or
13 broadcasting time because we charge only -- we call it cost
14 sharing. In other words, we charge only what it costs to
15 deliver the program, the cost of electricity, cost of -- just
16 out-of-pocket costs, in other words. Those various rates are
17 combined into one network rate and this isn't the actual
18 amount, but let's -- it's a pretty close amount. Let's say
19 that Dr. Kennedy's one hour a week he is billed let's say
20 \$5,000 for that broadcast time. That \$5,000 is then allocated
21 to each of the stations that broadcast Dr. Kennedy's program.
22 NMTV's portion would be allocated to it less the 5 percent
23 agency commission and the balance remitted to National
24 Minority.

25 Q The balance remitted to -- I see. Now, you

1 mentioned earlier that the 15 percent figure that's referred
2 to in this April 8, 1991 letter has been reduced to 5 percent.
3 When was the -- when did the 15 percent go down to 5 percent?

4 A I can't give you an exact date, but I --

5 Q Give me your best recollection.

6 A Well, it would just be sometime subsequent to April
7 8, 1991. I don't have a specific date.

8 Q Did it occur in 1992?

9 A I don't know.

10 Q Thank you.

11 REPORTER: Your Honor, I have to change the tape.

12 JUDGE CHACHKIN: Go ahead.

13 JUDGE CHACHKIN: All right. Let's proceed, Mr.
14 Cohen.

15 BY MR. COHEN:

16 Q Now, continuing on with the, the example from --
17 about Dr. Kennedy that you've described, who would make the
18 actual decision as to whether that program, the Dr. Kennedy
19 program, would be carried on the Portland station?

20 A Well, obviously all of the stations desire to have
21 the primary, you know, religious broadcasters on them. These
22 programs are offered to each of the stations that Media
23 Services represents and I suppose in most cases the local
24 station managers. Certainly in the case of NMTV I suspect Mr.
25 McClellan would, but as President of NMTV, I would certainly

1 urge them to carry the primary premium religious broadcasts of
2 -- that we consider the national broadcasts of America.

3 Q In point of fact you make that decision as to
4 whether Portland will carry the program, don't you, Doctor?

5 A I certainly help make that decision.

6 Q But don't you make the decision?

7 A In some cases I probably have.

8 Q Now, who makes the decision as to whether the
9 Portland station will not, will not, carry any particular TBN
10 program?

11 A Well, all of the, all of the stations within the
12 Trinity Network break away for certain local programs, for
13 certain community services programs. I certainly don't make
14 the schedule of those local programs. I can tell you that the
15 station manager, Mr. Jim McClellan, has determined when to
16 break away from the network programming for their local
17 programming, for the insert of community services programs and
18 that sort of thing. I certainly don't make those decisions.

19 Q But isn't it true that Mrs. Duff together with Mr.
20 McClellan make that decision?

21 A They, they probably do, yes, sir.

22 Q Now, you are aware -- turning to another matter, you
23 are aware that, that NMTV utilizes consulting services of more
24 than one engineer. My question is isn't it true that Mr.
25 Miller is the primary provider of engineering consulting

1 services to NMTV?

2 A Well, sir, primary is a subjective term. I know
3 there --

4 Q Well, most of them.

5 A It would depend on which area of engineering you
6 were referring to, sir.

7 Q Well, at page 35 of your deposition on October 6th I
8 asked you on line 3, "Isn't he," meaning Mr. Miller, "the only
9 person who provides engineering services for NMTV concerning
10 the full power station?" and you answered, "No," and I asked,
11 "Who else does?" and you answered, "Mr. Kevin Fisher here in
12 Washington. Other engineering services from time to time have,
13 other engineering services from time to time have provided
14 engineering services. I would say certainly Mr. Miller would
15 be the primary provider of engineering consulting services to
16 NMTV."

17 MR. TOPEL: Your Honor, may I read other portions of
18 the deposition?

19 JUDGE CHACHKIN: Is there something else that deals
20 with this subject?

21 MR. TOPEL: I believe so.

22 JUDGE CHACHKIN: Dealing with Mr. Miller?

23 MR. TOPEL: Dealing with other people who provide
24 engineering services.

25 JUDGE CHACHKIN: Go ahead. Read it.

1 MR. TOPEL: Starting on page 33, question --

2 JUDGE CHACHKIN: What line are you on?

3 MR. TOPEL: I'm on line 2. Question, "Does NMTV
4 have an Engineering Department?" Answer, "Yes." Question,
5 "Okay, and who heads up that Engineering Department?" Answer,
6 "That would -- my understanding would be Mr. Fountain, the
7 Chief Engineer of the Portland." Question, "I want to make
8 sure I understand this. Mr. Fountain. Who reports to who?
9 What's the -- what constitutes the staff of the NMTV
10 Engineering Department?" Answer, "Well, it would be Mr.
11 Fountain and his Assistant Chief and probably the -- Control
12 Operators at Portland. I'm not totally familiar with the, the
13 staffing up there."

14 MR. COHEN: Your Honor, that has nothing to do with,
15 with consulting engineering services.

16 MR. TOPEL: Well, let me, let me continue. I
17 haven't finished yet. Question, "Well, this letter is signed
18 by Ben Miller, Engineering, and it's on the letterhead of NMTV
19 Engineering Department. Now, does Mr. Miller report to Mr.
20 Fountain?" Answer, "No. He serves as, as we've established,
21 as an -- as a engineering consultant to National Minority
22 T.V." Question, "But it's your understanding that Mr.
23 Fountain heads up the, heads up the Engineering Department of
24 NMTV?" Answer, "He's in charge of the engineering at the NMTV
25 station, yes, sir."

1 MR. COHEN: Your Honor, I submit to you my question,
2 if you want to hear the facts --

3 JUDGE CHACHKIN: Well, I want to hear about it.
4 Let's continue. In the future, Mr. Topel, you'll do this when
5 you have the witness on redirect rather than on direct. We're
6 proceeding much too slowly. Go ahead, Mr. Cohen.

7 MR. COHEN: Yes, sir. I want to ask you about
8 paragraph 29 of your testimony, line --

9 MR. TOPEL: Excuse me, Mr. Cohen?

10 MR. COHEN: 29 of your testimony. Now, this is your
11 written testimony, Dr. Crouch.

12 MR. TOPEL: Dr. Crouch, that's the volume that's
13 right on top, underneath --

14 BY MR. COHEN:

15 Q Where you state --

16 A What page, sir?

17 Q Page -- paragraph 29, page 14.

18 A Yes. I'm there.

19 Q Where you state, "I understood," the fifth line, you
20 see that, "I understood that both counsel and Mrs. Duff?"

21 A Yes.

22 Q Isn't it more accurate that you mean assumed rather
23 than understood? Weren't you assuming that?

24 A I don't know that I distinguish those two words as
25 succinctly as you do, sir. Understood and assumed I think are

1 synonymous to me.

2 JUDGE CHACHKIN: In other words, you didn't have
3 personal knowledge that counsel and Mrs. Duff had reviewed it?

4 DR. CROUCH: No, sir. No, sir.

5 JUDGE CHACHKIN: Let's proceed, Mr. Cohen.

6 MR. COHEN: Thank you, Your Honor.

7 BY MR. COHEN:

8 Q Look at paragraph 32 and line 3. I want you to
9 define the word contributory as you have used it in your
10 testimony.

11 A Well, when you made a contribution you give
12 something voluntarily. It was always my understanding that,
13 that Trinity Broadcasting was the sponsoring organization. We
14 were both non-profit corporations. In the world of non-profit
15 churches or other non-profit corporations it's not at all
16 uncommon for them to contribute one to the other just out of
17 the goodness of their hearts.

18 Q And donate -- is the word donate different than
19 contributory or is it -- does it mean the same?

20 A I think they would be synonyms.

21 Q And the next sentence you say, "Until NMTV could
22 stand on its own." What do you mean by that, stand on its
23 own?

24 A Well, until NMTV could acquire sufficient broadcast
25 properties and from such sufficient revenues to become

1 completely, totally self-sustaining.

2 Q And pay off its debt to TBN?

3 A Yes.

4 Q And do you have a time frame for when NMTV, using
5 your term, will stand on its own?

6 A I don't believe any particular time frame has yet
7 been established.

8 Q Going on in that paragraph, line 8, you say, "TBN,
9 therefore, did not employ a straight hard line business
10 approach." What does a straight, hard line business approach
11 mean?

12 A Well, in the world of for-profit corporations, if
13 you loan money you expect it to be repaid with the best rate
14 of interest you can exact. You deal much more formally in the
15 world of for-profit corporations than, my experience is, in
16 the world of non-profit corporations.

17 Q Thank you. Now, the -- paragraph 32, second
18 sentence that you commented on describes the first concept.
19 See that?

20 A Yes, sir.

21 MR. COHEN: Strike that question, Your Honor.

22 BY MR. COHEN:

23 Q I want to ask you about the acquisition of the
24 Portland -- of the Wilmington station. You recall that
25 purchase which was aborted. You enlisted the services of Ben

1 Miller in connection with pursuing the matter of looking into
2 the purchase of the Wilmington station? Am I correct?

3 A I believe the time came and Mr. Miller gave us some
4 input on the Wilmington station, yes, sir.

5 Q Give me your best recollection of what services Mr.
6 Miller provided.

7 A Oh, he would have probably provided the power of the
8 station, the expected range or coverage of the station, the
9 topography of the region as to what areas might be shadowed or
10 have difficulty receiving the signal, generally how good a
11 station was it.

12 Q You also asked him to travel to Wilmington to
13 inspect the station, didn't you?

14 A I believe on one occasion he did do that, yes, sir.

15 Q And you requested him to do that, didn't you?

16 A Yes, sir.

17 Q And you also asked him to send one of the Chief
18 Engineers of Trinity's other stations out to Wilmington to
19 physically review the station, did you not?

20 A I, I believe I did that simply because he was nearer
21 to the Wilmington/Philadelphia area.

22 Q And that station was in Canton, Ohio?

23 A Canton, Ohio, yes, sir.

24 Q And that -- the Chief Engineer of the Canton station
25 did, in fact, travel to Wilmington and make that physical

1 review? Is that correct?

2 A My understanding is he did.

3 Q Yes. And he wrote a report, did he not?

4 A I believe he did.

5 Q Which you reviewed, did you not?

6 A I believe I did.

7 Q I'd like to ask you to look at what's been admitted
8 into evidence in this proceeding as Joint Exhibit 2.

9 MR. COHEN: Could you get that for the witness?

10 MR. TOPEL: What exhibit is that?

11 MR. COHEN: That's the report from David Morris.

12 MR. TOPEL: It's got Morris as Joint Exhibit 1.

13 MR. COHEN: Excuse me. I stand correct, Joint
14 Exhibit 1.

15 BY MR. COHEN:

16 Q Now, have you reviewed this -- have you ever seen
17 this document before this minute, Dr. Crouch, this joint, this
18 joint exhibit?

19 A May I take a moment just to review it?

20 Q Yes. I want you to take as much time as you need.
21 It's a lengthy document. I'm not going to ask you about every
22 page, but I certainly want you to be familiar with the
23 document when I question you about it, so take as much time as
24 you think you need.

25 A I'm generally aware now of what this document is,

1 | sir. I have not thoroughly digested it or read it, but I am
2 | -- I have become aware fairly recently of its existence.

3 | Q Okay. I think that's sufficient for my purposes.
4 | If you need, if you need -- whatever time you need to answer a
5 | question, then take it, but I want to move this along as
6 | quickly as I can. Now, you'll notice starting on page 28 that
7 | there's a discussion by Mr. Morris. You know who Mr. Morris
8 | is, don't you?

9 | A Yes.

10 | Q There's a discussion by him of the corporations that
11 | TBN has loaned money to and the amount of the loan and the
12 | conditions of the loan. Have you noticed that? Do you
13 | notice that?

14 | A I'm --

15 | Q Beginning in paragraph 46.

16 | A I am noticing that now, yes, sir.

17 | Q And just skim the paragraphs with that in mind, and
18 | then I want to ask you some questions. It begins on 46 and it
19 | continues on through paragraph 69. Now, what I wanted to ask
20 | you beginning in paragraph 46 with, "Concerning Community
21 | Educational Television Station," first of all, how many, how
22 | many stations does Community Educational Television Station
23 | have? It's the licensee of how many, how many stations?

24 | A Three full power stations.

25 | Q And these are, these are full power television

1 stations? Correct?

2 A Full power non-commercial television stations, yes,
3 sir.

4 Q And am I correct that there are some common Board
5 members between Community Educational Television and TBN?

6 A Yes.

7 Q And can you -- do you know who the common Board
8 members are, sir?

9 A Yes.

10 Q Would you state that for the record?

11 A That would be myself, Mrs. Duff, Norm Juggert and my
12 wife, Janice Crouch.

13 Q And going on to Jacksonville Educated Broadcasting,
14 that's an FM -- FM or television station?

15 A No. Those are -- that's the licensee of two non-
16 commercial television full power stations.

17 Q I forgot to ask you. Where are the stations
18 licensed -- the community of license for Community Educational
19 Television?

20 A Harlingen, Texas; Beaumont, Texas; and Houston,
21 Texas.

22 Q And where are the stations licensed to for
23 Jacksonville Broadcasting?

24 A For Pierce, Florida and Jacksonville, Florida.

25 Q And are there common directors between Jacksonville

1 Educated Broadcasting and TBN?

2 A That's a much larger Board, but yes, there are
3 common Board members and they would be --

4 Q Who are they?

5 A I believe they would be same as for Community
6 Educational Television.

7 Q Now, are there any -- were there any -- Oceana
8 Broadcasting Network. What, what stations are licensed to
9 Oceana Broadcasting Network?

10 A My understanding is the only station licensed to
11 Oceana is the station in Honolulu, Hawaii.

12 Q And are there any common Board members?

13 A No.

14 Q Same question for Prime Time Video?

15 A There are no common directors for Prime Time.

16 Q And where is -- what does Prime Time own stations?

17 A Roswell, New Mexico, Midland/Odessa, Texas and a
18 number of low power stations that I could not identify.

19 Q Same question for Sunlight Broadcasting Systems, any
20 common directors?

21 A There are no common directors.

22 Q Where does Sunlight own stations?

23 A I believe it's Mobile, Alabama; Montgomery, Alabama;
24 Memphis, Tennessee; and Nashville, Tennessee.

25 Q Radiant Life Ministries, any common directors?

1 A No, sir, none.

2 Q Where does Radiant own stations?

3 A I believe Greensboro, North Carolina.

4 Q All American T.V., any common directors?

5 A None.

6 Q Where does All American T.V. own stations?

7 A I believe LaSalle, Illinois; St. Joseph, Missouri;
8 Bartlesville, Oklahoma; and Albuquerque, New Mexico, I
9 believe.

10 Q Now, the document speaks to this, but just for
11 purposes of making sure this is clear in your mind, each one
12 of the entities that I've read into the record owes money to
13 TBN? You're aware of that?

14 A I believe that is a true statement. I'm not 100
15 percent sure of that, sir.

16 Q And the document also speaks to this, but I want to
17 make sure you're aware of it. Each one of these entities that
18 I've read into the record has an Affiliation Agreement with
19 TBN? Is that correct?

20 A I believe so.

21 Q Now, are each of these entities, and we can go
22 through them one by one if, if it's necessary, are each of
23 them pursuant to the -- strike that. Strike that. Do each
24 one of these entities have an Affiliation Agreement in writing
25 with TBN?

1 A I believe they do.

2 Q And are each of these -- do each of these
3 Affiliation Agreements require the affiliate to carry certain
4 TBN programs?

5 A I believe they do require them to carry the primary
6 TBN flagship program, Praise the Lord, and perhaps a certain
7 percentage of the network programs.

8 JUDGE CHACHKIN: Are we moving on to something else
9 or this is the same?

10 MR. COHEN: This is part of the same area, Your
11 Honor, but I mean it's --

12 JUDGE CHACHKIN: It's up to you. Do you want to
13 take a break now? Is it convenient for you now?

14 MR. COHEN: In about a minute, Your Honor.

15 JUDGE CHACHKIN: All right.

16 MR. COHEN: If I could have a minute. Thank you,
17 Your Honor.

18 BY MR. COHEN:

19 Q I want you to look at Bureau Exhibit 114 which is an
20 Affiliation Agreement between TBN and --

21 MR. TOPEL: That's in Volume 3.

22 BY MR. COHEN:

23 Q And what I'm trying to do is to move as rapidly as
24 possible, Dr. Crouch, which I'm sure you would agree is
25 desirable.

1 A Yes, sir.

2 Q And please direct your attention to paragraph 2 or
3 Section 2 of that agreement.

4 A What is the exhibit page?

5 MR. TOPEL: Exhibit No. 114, Dr. Crouch.

6 BY MR. COHEN:

7 Q I'm sorry. I thought you had it.

8 A Okay. I'm at 114, Affiliation Agreement, yes, sir.

9 Q Right. Look at paragraph -- Section 2. Is -- would
10 you say that this is typical --

11 JUDGE CHACHKIN: What page is Section 2?

12 MR. COHEN: It's on page 2 of the, of the agreement,
13 Your Honor.

14 JUDGE CHACHKIN: As far as the witness has it.

15 DR. CROUCH: I have it, sir.

16 BY MR. COHEN:

17 Q First, spend as much time as you need reviewing
18 Section 2 which is entitled Programming.

19 A I have generally --

20 Q Okay.

21 A -- perused it.

22 Q Now, if necessary we can go through the Affiliation
23 Agreement of each entity and I hope we can avoid that, but my
24 question is would you agree that the provisions in paragraph 2
25 generally apply to all of the Affiliation Agreements, that --

1 Affiliation Agreements with the companies that I've read into
2 the record?

3 A I believe generally speaking that would be true.
4 There could possibly be some minor variations, but in essence
5 I believe this is correct.

6 Q Now, I'd like you -- I'd like to ask you a question.
7 It's my understanding, and correct me if I'm wrong, that the
8 debt of each of these entities that I've read into the record
9 is being repaid in a similar fashion. Am I correct?

10 A In a similar fashion to what?

11 Q Yes. They're all repaying their debt to TBN in a
12 similar way. Am I correct? And then I want you to state for
13 the record how they are repaying their debt.

14 A I don't believe they're all being repaid
15 identically.

16 Q All right. Then I -- your point is well taken.
17 Let's do this. How is the debt from Community Educational
18 Television, Inc. being repaid, if you know?

19 A I know that recently a fairly substantial lump sum
20 payment was repaid in the neighborhood of \$200,000 or
21 \$300,000. I'm not 100 percent sure if there is a regular
22 monthly repayment schedule or not.

23 Q Well, here's what I was trying to elicit from you,
24 and tell me if I'm wrong, and I want you to look at page 40 --
25 the purpose of this, look at page 43 of your deposition,

1 Volume 2.

2 MR. COHEN: Your Honor --

3 JUDGE CHACHKIN: Just ask him the question.

4 MR. COHEN: Okay. Here's --

5 JUDGE CHACHKIN: Rather than referring him to the
6 deposition just ask the question.

7 MR. COHEN: Okay.

8 BY MR. COHEN:

9 Q Here is what my understanding is as to how this is
10 being repaid. One example would be if Trinity Broadcasting
11 Network had loaned a particular entity some monies. There
12 would be the standard 20 percent retention for programming
13 services provided, perhaps an additional 10 percent, 20
14 percent in some cases, up to 30 percent additional retention
15 of zip code donation income retained for paying down the debt.
16 The length and time might possibly vary with some agreements.
17 Is that an accurate statement?

18 A That would be for some of the affiliates.

19 Q Tell me for which affiliates was that an accurate
20 statement?

21 A That would be an accurate statement for, for
22 example, All American Television. It would be an accurate
23 statement for, I believe, Radiant Life. For Sunlight that
24 would not be an accurate statement. In the case of Sunlight
25 there was a -- there's a formal note and repayment schedule

1 where they send a check each month as opposed to a retention
2 of zip code remuneration.

3 Q Can you continue on? Do you have -- do you want to
4 look at Exhibit 2 to help your recollection for the names of
5 the entities or do you have them in mind, remaining entities?

6 JUDGE CHACHKIN: Why don't you state the entity, Mr.
7 Cohen?

8 MR. COHEN: Very good. You've -- thank you, Your
9 Honor. That's helpful.

10 BY MR. COHEN:

11 Q Community Educational Television?

12 A I've already answered that question.

13 Q Jacksonville Educators Broadcasting?

14 A I'm not sure of the repayment schedule on
15 Jacksonville.

16 Q Oceana?

17 A That would be through a retention of zip code
18 remuneration.

19 Q Prime Time Video?

20 A I believe that would also be through a retention of
21 zip code remuneration.

22 Q Sunlight?

23 A I answered that as being a note and monthly payment
24 schedule.

25 Q Radiant Life Ministries?

1 A I believe that would be a retention of zip code
2 remuneration.

3 Q All American T.V.?

4 A Retention of a certain percentage of zip code
5 remuneration.

6 Q Now, regarding these companies, to your knowledge
7 does Ben Miller have a relationship with Community Educational
8 Television, Inc.?

9 A I believe he has provided certain engineering
10 services for CET, yes.

11 Q And the same question for Jacksonville Educators
12 Broadcasting?

13 A I believe he has done the same for them.

14 Q And Oceana Broadcasting Network?

15 A On a very limited basis I believe he has provided
16 some engineering services.

17 Q Prime Time Video?

18 A I know of no such service for Prime Time.

19 Q Sunlight Broadcasting?

20 A Yes, some services for Sunlight.

21 Q Radiant Life Ministries?

22 A I'm not aware of any services for Radiant Life.

23 Q All American T.V.?

24 A Some services for All American, yes.

25 Q And when Mr. Miller provided those services, was he

1 acting as a Technical Consultant?

2 A I presume he was.

3 Q Now, Jane Duff has a relationship with Jacksonville,
4 doesn't she? The name of the entity is Jacksonville --

5 A Jacksonville Educators Broadcasting.

6 Q Yes. She has a relationship to that entity, does
7 she not?

8 A Yes.

9 Q And what is it?

10 A She is a member of the Board.

11 Q And she has a relationship to Community Educational
12 Television, Inc.? Am I correct?

13 A Also a member of the Board.

14 Q And Terry Hickey at one time had a relationship to
15 All American? Correct?

16 A He was at one time a -- an employee, I believe, but
17 I believe that was the extent of it.

18 Q Well, he also -- he left TBN and went to work for
19 All American? Am I correct?

20 A Yes.

21 Q And then he came back?

22 A Yes.

23 Q And he was an officer and a director? Am I correct?

24 A Of what?

25 Q Of the -- of All American and/or its parent?

1 A I, I do not know if he was an officer or a director.

2 MR. COHEN: Your Honor, this would be a good time to
3 break.

4 JUDGE CHACHKIN: All right. We'll take a recess
5 until 1:45.

6 (Whereupon, a brief recess was taken from 12:30 p.m.
7 until 1:45 p.m.)

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A F T E R N O O N S E S S I O N

JUDGE CHACHKIN: On the record. Mr. Cohen?

MR. COHEN: Thank you, Your Honor.

BY MR. COHEN:

Q When we recessed for lunch, Dr. Crouch, I was asking you some questions about the entities that are set forth in Joint Exhibit 1 and I was asking you particularly about Ben Miller who is -- who he is is clear in the record. I would ask you, if you would, would you look at Bureau Exhibit 378?

MR. TOPEL: That's in Volume 6, 378.

DR. CROUCH: Yes, sir. I'm there.

BY MR. COHEN:

Q Now, that's a document dated October 3, 1991? Is that correct?

A Yes.

Q And this is a memo to Alice Fields from Ben Miller? Correct?

A Yes.

Q Okay. Do you know who Alice Fields is?

A No, sir. I'm sorry. I don't.

Q Well, I think the record will reflect that it's Mr. Miller's secretary, but that's not important for purposes of my question. Have you ever seen this document before this minute?

A I don't have any recollection of seeing it, no, sir.

1 Q Now, this document is in evidence and it's self-
2 explanatory. The question that I wanted to put to you, Dr.
3 Crouch, is insofar as Community Educational Television, Inc.
4 is concerned, did Ben Miller receive any compensation from
5 that entity for acting as Vice President for Engineering?

6 A I don't believe he did, but I am not -- I have no
7 absolute independent knowledge of that.

8 Q Does he still -- to your knowledge does he still
9 serve in the capacity of Vice President for Engineering for
10 Community Educational Television, Inc.?

11 A I believe he does.

12 Q So it's your testimony that, that you don't think he
13 has ever received any compensation?

14 A I am not aware of any and I don't believe he has.

15 Q Does he donate his, does he donate his services
16 then?

17 A I believe that is the case.

18 Q And I take it he does this while he's working for
19 TBN?

20 A Yes, I suppose so. I don't know that, but I presume
21 so.

22 Q And his income from TBN is not affected by the
23 services he renders on behalf of Community Educational
24 Television, Inc.? Am I correct?

25 A Not to my knowledge.

1 Q And I want to ask you the same questions about Mr.
2 Miller's relationship to Jacksonville Educators Broadcasting,
3 Inc. You'll notice that he states to his -- to Ms. Fields
4 that he was Technical Consultant as of October 3, 1991. Are
5 you aware as to whether he still serves as Technical
6 Consultant?

7 A I believe he does.

8 Q And are you aware of what services he renders as
9 Technical Consultant?

10 A No, sir, not specifically.

11 Q Are you aware generally?

12 A Well, it would be in the technical engineering
13 field.

14 Q Does he provide the same services to your knowledge
15 for Jacksonville that he provides to Community Educational
16 Television, Inc.?

17 A I believe so.

18 Q Do you know why his title is different?

19 A No, sir, I don't.

20 Q So he has continued -- he continues in the capacity
21 of being Technical Consultant today to your knowledge?

22 A To my knowledge, yes.

23 Q And does he receive any compensation to your
24 knowledge from Jacksonville Educators Broadcasting, Inc.?

25 A He does not to my knowledge.